



**Anchorage  
Metropolitan  
Area  
Transportation  
Solutions**

**MUNICIPALITY OF ANCHORAGE  
Traffic Department**

***Transportation Planning Division***

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Mike Barton, Commissioner  
Alaska Dept of Transportation and  
Public Facilities  
Office of the Commissioner  
3132 Channel Drive  
Juneau, AK 99801-7898

re: Draft 2006-2008 Statewide  
Transportation Improvement Program (STIP)

Dear Mr. Barton:

Thank you for the opportunity to review the proposed Draft 2006-2008 STIP. The transportation priorities for Anchorage Metropolitan Area Transportation Solutions (AMATS) for the National Highway System and major roadways on the Non-National Highway System face significant delays as a result of reduced or eliminated funding in the proposed STIP. The Glenn and Seward Highways in the Anchorage area carry the largest volume of traffic in the State of Alaska. It's important that the State recognize and support the need to address existing and future deficiencies on these two National Highways in the Anchorage Bowl.

In addition, it's evident that the proposed Draft 2006-2008 STIP allocation for roadway and trail development for the Non-National Highway System (i.e. CTP, TRAAK, and CMAQ) represents about a 50% reduction in these STIP categories from the previous 2004-2006 STIP allocation. This level of a reduction will impact delivery of major construction projects. In particular, the proposed AMATS allocation would result in significant delays in many projects, completely end the CMAQ allocation in our area, and would therefore result in many important needs of our community being ignored.

Projects that would be delayed due to this decrease in AMATS' allocation include but are not limited to the following:

- Old Seward Highway Reconstruction - delayed 2 years
- Victor Road Reconstruction - delayed 3 years
- Huffman Road Reconstruction - delayed 3 years
- Eagle River Road Reconstruction - delayed 3 years
- Old Glenn Highway Reconstruction - delayed 3 years
- Lake Otis Parkway Pavement Replacement - delayed 3 years
- Spenard Road Reconstruction - delayed 3 years
- Abbott Road Reconstruction - delayed 3+ years
- O'Malley Road Reconstruction - delayed 4+ years

This shortfall also means many projects currently in the preliminary engineering and environmental phase will also be significantly delayed. Some of these projects may be delayed for so long it wouldn't make sense to even start them due to the uncertainty of funding even though they remain priorities of the community. In addition, much of the National Highway System (NHS) funding is eliminated, including improvements on the Seward Highway, between Anchorage and Girdwood. Though the Seward Highway Improvements are not in the AMATS area they represent a needed improvement to an area that many residents of Anchorage travel quite often. In addition to those specific



roadway projects, the TE and CMAQ programs will be reduced to very small allocations. With the proposed TE allocation, AMATS will only be able to program \$1.7M (10%) which will equate to one TE project per year.

Of particular concern, the proposed STIP shows no funding allocation for the CMAQ program to the AMATS area beyond 2006. The CMAQ program has been and should continue to be allocated to AMATS at a minimum of \$3M annually to support maintaining its good air quality and to address congestion mitigation projects. We have many needs that have been addressed by this program historically, including our public transportation system as well as measures that have moved us from a non-attainment area to a maintenance area. We are very concerned about the ramifications of eliminating funding for CMAQ in the AMATS area and request that the historical \$3M allocation be restored. We understand that other remote areas of Alaska have issues with dust problems, but these congestion mitigation and air quality funds are needed in the AMATS area to help solve our numerous congestion problems. We are also concerned about the possibility of violating federal air quality standards if we lose this funding. People Mover, an essential service for our community, especially among low income and minorities, will lose all ground gained in restructuring service as a result of this proposed STIP.

The draft STIP contains \$600 million in funding for the Knik Arm Crossing in 2006. It is our understanding that, in order to be programmed in the STIP as illustrated in the Draft STIP as a construction project, federal findings of air quality conformity must be made (sec 23 CFR 450.216(a)). At this time no such determination has been made with respect to the Knik Arm Crossing. In addition, the Draft STIP appears to show using "Advanced Construction (AC)" as a means to secure the programming of funds for Knik Arm Bridge, this causes great concern for Anchorage and should for the rest of the State as well. Though it may be possible to AC a project that has not completed its environmental document, it does not seem reasonable. AMATS and other parts of the state have used the opportunity to apply AC, with the Commissioner's concurrence, when a project is ready or under construction after the environmental, design and right-of-way phases have been completed. The risk to Anchorage and other communities are too great at this point to AC an entire project of such enormous scale.

The draft STIP is also missing another very important point concerning the Knik Arm Crossing which has been brought up in public meetings by the KABATA consultants. The construction of the bridge will create an unsustainable burden on the local Anchorage street system unless substantial improvements are made on the Anchorage side of the bridge. In particular it is very important to begin work immediately on the freeway to freeway connection linking the Glenn Hwy. to the Seward Highway. Without such a project, the Knik Arm Crossing will end up dumping traffic onto the already failing arterial street system. The freeway to freeway project will also have substantial congestion mitigation benefits to the rest of the Anchorage street system. If this project is not included in the 2006-2008 STIP, this important project will be delayed two years and may not be open in time to accommodate the increased traffic from the Knik Arm Crossing. (Note: the freeway to freeway project is included in the new 2025 Anchorage Long-Range Transportation Plan adopted by the AMATS Policy Committee on December 20, 2005.)

SAFETEA-LU guarantees that one and one-quarter percent (1.25%) of all federal highway core program dollars for the State of Alaska is set aside for metropolitan planning activities. This set-aside is derived from interstate maintenance, national highway system, surface transportation, congestion mitigation and air quality improvement, and highway bridge replacement and rehabilitation programs authorized under public law. This is a substantial increase of PL dollars, from previous years, in which only one percent (1%) of only the Surface Transportation Program (dollars) was set aside for metropolitan planning. This increase recognizes the renewed emphasis given to urban transportation planning at the federal level. The published USDOT Notice of Apportionment for both FFY 2005 and FFY 2006 PL funds reveals that the State of Alaska has now received in excess of \$1.4 million for each year, and yet the STIP reflects no more than the base amount stipulated in the 2002 distribution formula of \$675,000 to AMATS, and \$225,000 for FMATS. Federal law further stipulates that *"Any funds that are not used to carry out section 134 may be made available by a metropolitan planning organization to the State to fund activities under section 135."* It is the MPOs' prerogative whether any PL funds are to be reverted to the State, rather than the State dictating the use of metropolitan planning funds in non-MPO areas. This is an important distinction, and yet the draft STIP reflects metropolitan planning funds being held for statewide planning purposes.



When compared to the allocation of transportation funding to other parts of the state, AMATS' share is substantially less than one would expect given its size and particularly its congestion problems. The chart below shows the amount of STP by geographic area as well as the per capita amounts.

	2006	2007	2008	Total/ Per Capita
AMATS CTP/CMAQ/TE	\$17,302.0	\$23,163.9	\$17,490.3	\$57,956.2 \$206
FMATS CTP/CMAQ/TE	\$25,909.9	\$15,071.1	\$13,477.2	\$54,539.2 \$641
AMATS STP	\$12,753	\$13,987	\$15,134.8	\$41,874.8 \$149
FMATS STP	\$13,229	\$11,703.1	\$12,007.9	\$36,940 \$434
MAT-SU STP	\$4362.8	\$1817.9	\$4748.2	\$10,928.9 \$390

FMATS will receive, over the years 2006-08, \$54M + in CTP, TRAAK, CMAQ, preventative maintenance and 2 grandfathered projects. Compare that to AMATS' \$57M+ over the same time period. \$26M+ of the FMATS share consists of 2 time trap projects which, if they do not proceed, FMATS will have to repay federal funds. While we understand the need to move those projects forward, those monies should come out of their allocation, and not in addition.

There is an allocation shown for "Expected Preventive Maintenance." The allocation shows \$7M for AMATS in 2007, and \$9.23M in 2006 and \$1.95M in 2007 for FMATS. We haven't heard of this allocation and are also not aware of how ADOT&PF arrived at these numbers. What exactly are these funds and what can they be expended on?

I recognize the challenge in allocating funding resources throughout the state and the difficult task ADOT&PF has in facing that challenge. However, the delays in project development that would result from the proposed allocation to AMATS would result in unacceptable increases in fatalities, congestion and maintenance costs. I would respectfully request that ADOT&PF revise its total allocation to AMATS to better reflect a proportionate per capita allocation. I would also request ADOT&PF reinstate an annual CMAQ allocation for AMATS to allow us to address our congestion mitigation issues.

Sincerely,



Craig Lyon  
AMATS Coordinator

cc: Peter Serrano, P.E., Transportation Planner, FHWA  
Amy Changchien, Community Planner, FTA Region 10  
Bob Laurie, Transportation Planner, Statewide Program Development, ADOT&PF  
John MacKinnon, Deputy Commissioner Highways & Public Facilities, ADOT&PF